

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

<p>In Re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO</p> <p>As representative of</p> <p>THE COMMONWEALTH OF PUERTO RICO, et al</p> <p>Debtors</p>	<p>PROMESA</p> <p>TITLE III</p> <p>Case No. 17-BK-3283-LTS</p> <p>(Jointly Administrated)</p>
<p>In Re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO</p> <p>As representative of</p> <p>PUERTO RICO ELECTRIC POWER AUTHORITY,</p> <p>Debtor</p>	<p>PROMESA</p> <p>Title III</p> <p>Case No. 17-BK-4780-LTS</p> <p>This Application relates only to PREPA, and shall be filed in the lead Case No. 17-BK-3283-LTS and PREPA's Title III case (Case No. 17-BK-4780-LTS)</p>

MOTION BY INSTITUTO DE COMPETITIVIDAD Y SOSTENIBILIDAD
ECONOMICA DE PUERTO RICO (ICSE) IDENTIFYING PRELIMINARY LIST OF
POTENTIAL WITNESSES TO TESTIFY AT HEARING OF THE 1919 MOTION

TO THE US DISTRICT JUDGE HONORABLE LAURA TAYLOR SWAIN:

NOW COME, the appearing party represented by the undersigned counsel and
respectfully allege and pray:

1. The Honorable Court on May 22, 2019, entered Order Extending and
Establishing Deadlines Applicable to the Joint Motion of Puerto Rico Electric Power
Authority and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922, and 928,

and Bankruptcy Rules 3012 (A)(1) and 9019 for Order Approving Settlements Embodied in the Restructuring Support Agreement [ECF No. 1235]. (Docket #1253).

2. The appearing party is a private, not for profit 501 (c) (3) entity, which represents Puerto Rico's electricity consumers, industrial, commercial and residential, and who has actively participated in Energy related cases during the last 5 years.

The appearing party has litigated in front of the Puerto Rico Energy Commission (now PR Energy Bureau) in the state Courts, both First Instance and Appeal. Some of the cases have been removed to the Federal Court Promesa proceedings.

3. The appearing party opposes the RSA for it is contrary to applicable laws, contrary to PREPA's own fiscal situation and contrary to legislated applicable Commonwealth of Puerto Rico Public Policy.

4. The appearing party is interested in participating in the 1919 motion hearing set for July 24, 2019 and present the following witnesses:

A. Mr. Josen Rossi, Chairman of the Board ICSE; or Vice Chairman, Mr. José Rafael Fernández or Board of Directors Member Juan Larrea. These Board Members can be reached through the undersigned attorney.

The Board Member will testify on what is ICSE its participation in debates and cases concerning Energy issues, the impact of the RSA on Puerto Rico's Economy, and on the consumers it represents.

B. Executive Director of ICSE, Eng. Tomas Torres. Will testify on what is ICSE, its prior participation on energy issues and cases; why ICSE

opposes the RSA as contrary to public policies, laws, and the negative impact on the economy of Puerto Rico. Mr. Torres can be reached through the undersigned attorney.

C. Dr. Ramon Cao, PHD in economics, will testify on the economic consequences of the increase in electric energy rates caused by the RSA Securitization. Dr. Cao can be reached through the undersigned attorney.

D. Adversary Witnesses Eli Diaz and José Ortiz, Chairman of the Board and Executive Director of PREPA will testify on the content of the RSA, the economic, public policy and legal issues considered too reach the RSA and the consequences on PREPA's finances.

E. ICSE is currently in the process of contracting Dr. Eric Woychik, as expert witness on the benefits for PREPA and its grid of distributed energy, and renewable energy, which must be factored in a decision like the RSA.

WHEREFORE it is requested from this Honorable Court to receive this submitted information of potential witnesses.

CERTIFICATE OF SERVICE I hereby certify that, on this same date, I filed this document electronically with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all parties of record and CM/ECF participants in this case.

RESPECTFULLY SUBMITTED this 30th, day of May, 2019, in San Juan,
Puerto Rico.

s/FERNANDO E. AGRAIT
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